

**BellSouth Telecommunications, Inc.**

**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

**Patrick W. Turner**

General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

April 12, 2004

The Honorable Bruce Duke  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Analysis of Continued Availability of Unbundled Local Switching for  
Mass Market Customers Pursuant to the Federal Communication  
Commission's Triennial Review Order  
(Docket No. 2003-326-C)

Continued Availability of Unbundled High Capacity Loops at Certain  
Locations and Unbundled High Capacity Transport on Certain Routes  
Pursuant to the Federal Communication Commission's Triennial Review  
Order  
(Docket No. 2003-327-C)

Dear Mr. Duke:

Enclosed for filing are the original and fifteen copies of BellSouth Telecommunications, Inc.'s Submission of Errata and Witness Verifications in the above-referenced matters.

By copy of this letter, I am serving this pleading on all parties of record as reflected by the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml

Enclosures

cc: Parties of Record

PC Docs # 534611

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NOS. 2003-326-C AND 2003-327-C**

IN RE:

Analysis of Continued Availability of	)
Unbundled Local Switching for Mass Market	)
Customers Pursuant to the Federal	)
Communication Commission's Triennial	)
Review Order (Docket No. 2003-326-C)	)
	)
And	)
	)
Continued Availability of Unbundled High	)
Capacity Loops at Certain Locations and	)
Unbundled High Capacity Transport on	)
Certain Routes Pursuant to the Federal	)
Communication Commission's Triennial	)
Review Order (Docket No. 2003-327-C)	)
	)

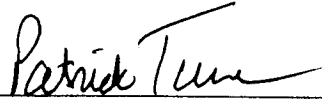
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**SUBMISSION OF ERRATA AND WITNESS VERIFICATIONS**

In compliance with the vote of the Public Service Commission of South Carolina ("Commission") during its April 6, 2003 Agenda Session, BellSouth Telecommunications, Inc. respectfully submits the attached eratta and to the extent required verifications of each of the witnesses that has pre-filed testimony on behalf of BellSouth in these proceedings.

Respectfully submitted, this 12th day of April 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Patrick W. Turner", written over a horizontal line.

Patrick W. Turner  
1600 Williams Street, Suite 5200  
Columbia, South Carolina 29201  
(803) 401-2900

R. Douglas Lackey  
Meredith E. Mays  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0747

ATTORNEYS FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.

534247

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Kenneth L. Ainsworth who, being by me first duly sworn, deposed and said that:

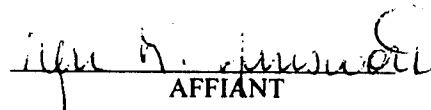
1. I, Kenneth L. Ainsworth, am a Director of Interconnection Operations for BellSouth.
2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of forty (40) pages and [four] (4) Exhibits;

Rebuttal testimony dated March 12, 2004 and consisting of twenty-six (26) pages and five (5) Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of seventeen (17) pages and one (1) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 12<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
MICHEALE F. BIXLER  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2005

[SEAL]

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – KEN AINSWORTH**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY ERRATA**

<b>DOCUMENT</b>	<b>PAGE and/or LINE</b>	<b>CHANGE DESCRIPTION</b>
Direct testimony	Page 7, Line 24	Add “or” after “(8 a.m.-5 p.m.)”
Direct testimony	Page 15, Line 1	Add “COORDINATED” after THE
Direct testimony	Page 23, Line 4	Change “7” to “4”
Direct testimony	Page 23, Line 5	Change “10” to “7”
Direct testimony	Page 24, Line 9	After “dates,” insert “time frames, after hour scheduling, account coordination,”
Direct testimony	Page 24, Line 21	Add “wire work” after “provisioning”
Direct testimony	Exhibit KLA-3	In the “August 2005” block, change “4.77M” to “3.84M”
Direct testimony	Exhibit KLA-3	In the “March 2006” block, change “2.22M” to “2.56M”
Direct testimony	Exhibit KLA-3	In the “October 2006” block, change “1.11M” to “1.28M”

STATE OF Illinois )  
COUNTY OF Cook )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Debra Aron who, being by me first duly sworn, deposed and said that:

1. I, Debra Aron, am Director of the Evanston office of LECG LLC and Adjunct Associate Professor at Northwestern University.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of forty-five (45) pages and eight (8) Exhibits;

Rebuttal testimony dated March 12, 2004 and consisting of forty-three (43) pages and one (1) revised Exhibit; and

Surrebuttal testimony dated March 31, 2004 and consisting of one hundred thirty-five (135) pages and three (3) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

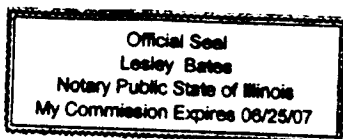
Debra Aron  
AFFIANT

Sworn to and subscribed before me this 8<sup>th</sup> day of April, 2004.

Lesley Bates  
NOTARY PUBLIC

My Commission Expires: 6/25/07

[SEAL]



**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - DR. DEBRA J. ARON**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY ERRATA**

- Page 1 Line 4-5      Evanston office of LECG, ~~LLC,~~
- Page 1 Line 8      LECG, ~~LLC.~~
- Page 22 Line 19-22    further subdivided into three “terciles” by spend. In each geographic market, we then count up the number of customers that are in each segment and spend level in that geographic market. This creates a profile of the spend characteristics of that market. ~~Each geographic market (that is, UNE zones subdivided by CEAs as discussed in Dr. Pleatsikas’s testimony) is then allocated the appropriate number of customers from each segment to reflect the actual economic profile of that market.~~
- Page 36 Line 6      Kaufman Brothers, L.P., April 30, 2003, p. 4.3)

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - DR. DEBRA J. ARON**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**SURREBUTTAL TESTIMONY ERRATA**

Page 68, Line 11-12    The same examples ~~illustrates~~ illustrate vividly why a time series of statewide average shares cannot



STATE OF VA )  
COUNTY OF Montgomery )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Randall S. Billingsley who, being by me first duly sworn, deposed and said that:

1. I, Randall S. Billingsley, am a finance professor at Virginia Polytechnic Institute and State University.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

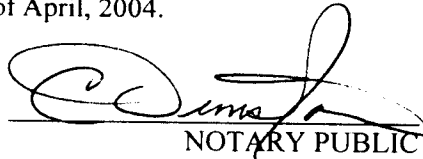
Direct testimony dated January 29, 2004 and consisting of thirty-one (31) pages and six (6) Exhibits;

Surrebuttal testimony dated March 29, 2004 and consisting of ten (10) pages and no (0) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 7<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: 8/31/05

[SEAL]

STATE OF GEORGIA )  
COUNTY OF FULTON )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared KATHY K. BLAKE who, being by me first duly sworn, deposed and said that:

1. I, KATHY K. BLAKE, am employed by BellSouth as Director – Policy Implementation for the nine-state BellSouth region.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of twenty (20) pages and four (4) Exhibits;

Rebuttal testimony dated March 12, 2004 thirty-one (31) pages and no Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of twenty-five (25) pages and one (1) Exhibit;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

Kathy K. Blake  
AFFIANT

Sworn to and subscribed before me this 12<sup>th</sup> day of April, 2004.

Michele F. Boxler  
NOTARY PUBLIC

My Commission Expires: MICHEALE F. BOXLER  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2005

[SEAL]

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - KATHY K. BLAKE**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY ERRATA**

Page 4, line 23: Insert the words "that are unaffiliated with each other or the ILEC" after the word "CLECs".

Page 4, line 25: Insert the words "unaffiliated with each other or the ILEC" after the word "CLECs."

Page 5, line 20: Insert the words "and implementing" before "such a batch process"

Page 8, line 21: Change "where it makes sense" to "where it makes economic sense"

STATE OF MISSOURI  
COUNTY OF BOONE

)  
)  
)

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Eric Fogle who, being by me first duly sworn, deposed and said that:

1. I, Eric Fogle, am employed by BellSouth Resources Inc., as a Director in BellSouth Telecommunications Inc. Interconnection Operations Organization.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

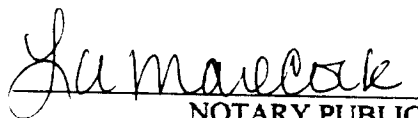
Rebuttal testimony dated March 12, 2004 consisting of twenty-four (24) pages and two (2) Exhibits; and

Surrebuttal testimony dated March 31, 2004 consisting of four (4) pages;

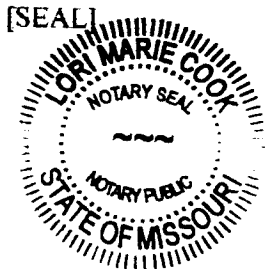
3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 8<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: October 26, 2006



LORI MARIE COOK  
Notary Public - State of Missouri  
COUNTY OF BOONE  
My Commission Expires Oct. 26, 2006

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared A. Wayne Gray who, being by me first duly sworn, deposed and said that:

1. I, A. Wayne Gray, am Director – Regional Planning and Engineering Center in the BellSouth Network Planning and support organization.

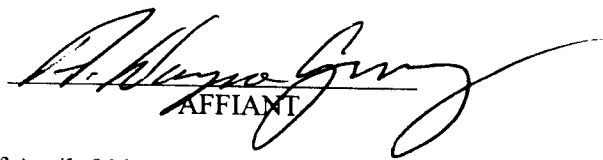
2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of six (6) pages and no Exhibits;

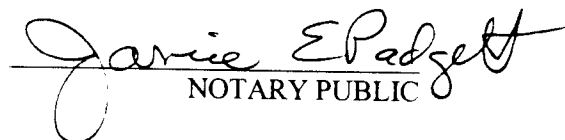
Rebuttal testimony dated March 12, 2004 and consisting of twenty-three (23) pages and no Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of twenty-two (22) pages and no Exhibits;

3. The contents of my foregoing testimony. as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

[SEAL]

Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

STATE OF Georgia )  
COUNTY OF Kulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Alfred A. Heartley who, being by me first duly sworn, deposed and said that:

1. I, Alfred A. Heartley, am General Manager – Wholesale Performance and Regional Centers for BellSouth.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of fourteen, 14, pages and one, 1, Exhibit;

Rebuttal testimony dated March 12, 2004 and consisting of six, 6, pages; and

Surrebuttal testimony dated March 31, 2004 and consisting of four, 4, pages and one, 1, Exhibit;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

Alfred A. Heartley  
AFFIANT

Sworn to and subscribed before me this 12<sup>th</sup> day of April, 2004.

Micheale F. Bixler  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
MICHEALE F. BIXLER  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2005

[SEAL]

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Milton McElroy Jr. who, being by me first duly sworn, deposed and said that:

1. I, Milton McElroy Jr., am a Director in BellSouth's Interconnection Services department.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004, and consisting of twenty-eight (28) pages and three (3) Exhibits; and

Surrebuttal testimony dated March 31, 2004, and consisting of eight (8) pages and no Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

Milton McElroy Jr.  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

Jarvis E Padgett  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

[SEAL]

STATE OF Georgia )  
 )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared W. Keith Milner who, being by me first duly sworn, deposed and said that:

1. I, W. Keith Milner, am Assistant Vice President – Interconnection Operations for BellSouth.

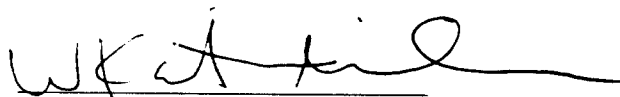
2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of ten (10) pages and five (5) Exhibits;


Rebuttal testimony dated March 12, 2004 and consisting of fifteen (15) pages and no Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of fourteen (14) pages and no Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

[SEAL]



STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Ronald M. Pate who, being by me first duly sworn, deposed and said that:

1. I, Ronald M. Pate, am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director – Interconnection Operations. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375..

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Direct testimony dated January 29, 2004, and consisting of thirteen (13) pages and two (2) Exhibits;

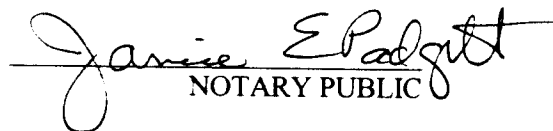
Rebuttal testimony dated March 12, 2004, and consisting of twenty-eight (28) pages and two (2) Exhibits; and

Surrebuttal testimony dated March 31, 2004, and consisting of fourteen (14) pages and five (5) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – RONALD M. PATE**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**REBUTTAL TESTIMONY ERRATA**

Page 12, line 8 – Change “98%” to “95%”

STATE OF California )  
COUNTY OF Alameda )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Christopher Jon Pleatsikas, who, being by me first duly sworn, deposed and said that:

1. I, Christopher Jon Pleatsikas, am a Principal at LECG, Inc.
2. I have pre-filed or caused to be pre-filed in Docket No. **2003-326-C** the following testimony:

Direct testimony dated January 29, 2004, and consisting of thirteen (13) pages and two (2) Exhibits;


Rebuttal testimony dated March 12, 2004, and consisting of eighteen (18) pages and no (0) Exhibits; and

Surrebuttal testimony dated March 31, 2004, and consisting of twenty-two (22)) pages and no (0) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 7<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: Sept. 28, 2005

[SEAL]



**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - DR. CHRISTOPHER JOHN PLEATSIKAS**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY ERRATA**

Page 6 Line 2	serve <del>the greatest</del> <u>a greater</u> number
Page 7 Line 16	might not be <del>a single market for</del> <u>served from a single location by</u> some CLECs
Page 8 Line 1	and <del>zones</del> <u>UNE Zones</u> follow wire center boundaries.

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - DR. CHRISTOPHER JON PLEATSIKAS**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**REBUTTAL TESTIMONY ERRATA**

Page 11, Line 14

even if serving some or any of the wire centers individually

**BELLSOUTH TELECOMMUNICATIONS, INC.**  
**WITNESS - DR. CHRISTOPHER JON PLEATSIKAS**  
**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**  
**DOCKET NO. 2003-326-C**  
**APRIL 12, 2004**  
**SURREBUTTAL TESTIMONY ERRATA**

Page 10, Line 3	densities tend to <u>be</u> higher in UNE Zone 1
Page 10, Lines 5-6	collocation <del>costs</del> <u>costs</u> across the State.

STATE OF OHIO )  
 )  
COUNTY OF HAMILTON )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared James W. Stegeman who, being by me first duly sworn, deposed and said that:

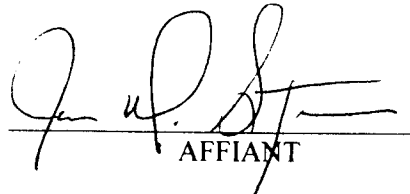
1. I, James W. Stegeman, am President of CostQuest Associates.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

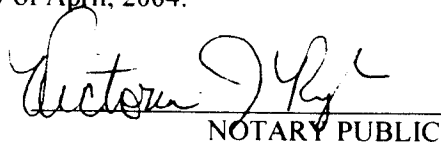
Direct testimony dated January 29, 2004 and consisting of fifty-nine (59) pages and five (5) Exhibits;

Surrebuttal testimony dated March 31, 2004 and consisting of sixty-five (65) pages and three (3) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 7 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: 2-23-09

[SEAL]



VICTORIA J. RYLES  
Notary Public, State of Ohio  
My Commission Expires 02-23-09

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - JAMES W. STEGEMAN**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY AND EXHIBITS ERRATA**

Page 3, line 10: insert the words "Mr. Milner," after the word "witnesses"

Page 15, line 12: delete the words "line maintenance;"

Page 25, line 5: delete the words "line maintenance;"

Page 25, lines 21-23: Strike the entire sentence beginning with the word "BACE ..."

**Revised Exhibit JWS-3**, pages 40/41, strike the paragraph under the "ApplyLoadings (Network Cost table only)" heading that originally read:

"The Yes/No flag indicates whether BACE should apply the InPlant and Loadings factors from the InPlantAndLoadings table to the cost record.

Possible entries include Y or N. Typically, costs that are capital expenditures represent material only and will require the application of InPlant and Loading factors and have ApplyLoadings set to "Y"."

And replace it with:

"The Yes/No flag indicates whether BACE should apply the Loadings factors from the InPlantAndLoadings table to the cost record. Possible entries include Y or N. Typically, costs that are capital expenditures represent material only and will require the application of InPlant and Loading factors, the latter of which are applied to those cost elements with the ApplyLoadings toggle set to "Y"."



STATE OF ALABAMA )  
COUNTY OF JEFFERSON )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Gary Tennyson who, being by me first duly sworn, deposed and said that:

1. I, Gary Tennyson, am employed by BellSouth Telecommunications, and am a Principal Member – Technical Staff.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-326-C the following testimony:

Rebuttal testimony dated March 12, 2004 and consisting of sixteen (16) pages and one (1) Exhibit.

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 7<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
**NOTARY PUBLIC STATE OF ALABAMA AT LARGE**  
**MY COMMISSION EXPIRES: May 19, 2004**  
**BONDED THRU NOTARY PUBLIC UNDERWRITERS**

[SEAL]

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Pamela A. Tipton, who, being by me first duly sworn, deposed and said that:

1. I, Pamela A. Tipton am Director – Interconnection Services.
2. I have pre-filed or caused to be pre-filed in Docket No.2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of sixteen (16) pages and seven (7) Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of twenty-one (21) pages and five (5) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 12<sup>th</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
MICHEALE F. BOXLER  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2005

[SEAL]

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – PAMELA A. TIPTON**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY ERRATA**

1. On page 4, line 14, delete “circuit”.
2. On page 5, line 1, delete semi-colon and insert “and” before “(2)”.
3. On page 5, line 2, delete semi-colon and insert period after “ILEC”.
4. On page 5, line 2, delete “and 3)” and insert “Additionally,” before “the”.
5. On page 16, line 7, delete “CLECs are” and replace with “a CLEC is”.
6. On page 16, line 7, delete “their” and replace with “its”.

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – PAMELA A. TIPTON**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**SURREBUTTAL TESTIMONY ERRATA**

1. On page 12, line 17, replace “that state” with “this state”.
2. On page 12, line 19, replace “that state?” with “South Carolina.”.
3. On page 12, line 24, replace “as” with “of”.
4. On page 16, line 4, insert “self-provisioning trigger” before “test”.
5. On page 16, line 7, replace “its” with “BellSouth’s”.
6. On page 19, line 20, replace “Furthermore” with “Additionally”.

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Alphonso J. Varner who, being by me first duly sworn, deposed and said that:

1. I, Alphonso J. Varner, am employed by BellSouth as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

2. I have pre-filed or caused to be pre-filed in Docket No.2003-326-C the following testimony:

Direct testimony dated January 29, 2004 and consisting of forty-four (44) pages and four (4) Exhibits;

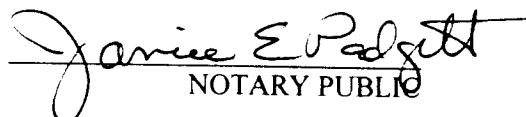
Rebuttal testimony dated March 12, 2004 and consisting of twenty-six (26) pages and no Exhibits; and

Surrebuttal testimony dated March 31, 2004 and consisting of thirty-seven (37) pages and one (1) Exhibit;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

[SEAL]

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS - ALPHONSO J. VARNER**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY AND EXHIBITS ERRATA**

Page 7, line 13: INSERT the word "Confirmation" as in "Service Inquiry with Firm Order Confirmation."

Page 12, line 8: ADD the sentence; "For Local Interconnection Trunks, the average reject interval for the one month that BellSouth missed (September 2003) during this 12-month period was 3.75 days against a benchmark of 4 days."

Page 16, line 9: ADD the sentence; "For Local Interconnection Trunks, the average FOC interval for the one month that BellSouth missed (August 2003) during this 12-month period was 2.31 days against a benchmark of 10 days."

**Exhibit AJV-1**

Page 21, paragraph 30: ADD, at the end of the first sentence, the language "and for Local Interconnection Trunks the benchmark is 85% within 4 days."

Page 21, paragraph 30: CHANGE the phrase "24-hour" to "relevant" and "LSRs" to "LSRs/ASRs" – as in "BellSouth met or exceeded the relevant benchmark for 416 of the 428 LSRs/ASRs (97%) rejected for November 2002 through October 2003, well above the 85% requirement."

Page 24, paragraph 35: ADD, after the first sentence, the statement "The benchmark for LIT orders is 95% in 10 days."

Page 24, paragraph 35: CHANGE the phrase "24-hour" to "relevant" and "LSRs" to "LSRs/ASRs" – as in "BellSouth in South Carolina returned FOCs for 761 of the 771 manual LSRs/ASRs (99%) submitted CLECs within the relevant criteria for the months of November 2002 through October 2003."

**Exhibit AJV-2**

Page 2, under the section of the SQM page entitled "Report Structure" for the measure PO-3, CHANGE:

"0 - <= 7 Business days" to "0 - <= 4 Business days"

"> 7 Business days" to "> 4 Business days"

"0 - <= 10 Business days" to "0 - <= 6 Business days"

">10 Business days" to "> 6 Business days"

Page 2, under the section of the SQM page entitled "SQM Level of Disaggregation" for the measure PO-3, CHANGE:

"95% <=7 Business Days" to " 95% <= 4 Business Days"

"95% <=10 Business Days" to " 95% <= 6 Business Days"

STATE OF MASSACHUSETTS )  
 )  
COUNTY OF MIDDLESEX )

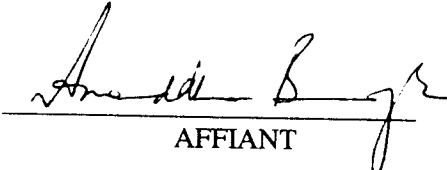
Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Aniruddha Banerjee who, being by me first duly sworn, deposed and said that:

1. I, Aniruddha Banerjee, am Vice President of NERA Economic Consulting.
2. I have pre-filed or caused to be pre-filed in Docket No. 2003-327-C the following testimony:

Direct testimony dated March 12, 2004 and consisting of 19 pages and 2 Exhibits; and

Rebuttal testimony dated March 31, 2004 and consisting of 8 pages and no Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 1<sup>st</sup> day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: 9/24/04

[SEAL]

**SILVIA SANTOS**  
**NOTARY PUBLIC**  
My commission expires Sept 24 2004



STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared A. Wayne Gray who, being by me first duly sworn, deposed and said that:

1. I, A. Wayne Gray, am Director – Regional Planning and Engineering Center in the BellSouth Network Planning and support organization.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-327-C the following testimony:

Direct testimony dated March 12, 2004 and consisting of fourteen (14) pages and six (6) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2006

[SEAL]

STATE OF Georgia )  
COUNTY OF Fulton )

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Shelley W. Padgett who, being by me first duly sworn, deposed and said that:

1. I, Shelley W. Padgett, am employed by BellSouth as Manager – Regulatory and Policy Support in the Interconnection Services organization. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

2. I have pre-filed or caused to be pre-filed in Docket No. 2003-327-C the following testimony:

Direct testimony dated March 12, 2004, and consisting of thirty-nine (39) pages and fifteen (15) Exhibits; and

Rebuttal testimony dated March 31, 2004, and consisting of ten (10) pages and no (0) Exhibits;

3. The contents of my foregoing testimony, as amended by any filed errata to my testimony, if applicable, are true to the best of my knowledge.

Shelley W. Padgett  
AFFIANT

Sworn to and subscribed before me this 9 day of April, 2004.

Janice E Padgett  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
Notary Public, Gwinnett County, Georgia  
My Commission Expires Feb. 19, 2008

[SEAL]

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – SHELLEY W. PADGETT**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-327-C**

**APRIL 12, 2004**

**DIRECT TESTIMONY AND EXHIBITS ERRATA**

1. p. 3, line 9. Replace “11” with “9” in both appearances.
2. p. 3, line 10. Replace “10” with “9”.
3. p. 5, line 17. Delete “a” and replace “loop” with “loops” so that the line reads, “that are offering loops on a widely available wholesale basis to other carriers seeking to”
4. p. 5, line 18. Delete “at the location”.
5. p. 11, line 18. Delete the comma.
6. p. 12, line 5. Replace “fiber-base” with “fiber-based”.
7. p. 15, line 11. Insert “evidence” between “other” and “that” so that the line reads, “wholesalers at the carrier level based on the evidence from discovery and other evidence that”.
8. p. 33, line 1. Change “in the customer location” to “along the route”.
9. p. 33, line 2. Delete “loop”.
10. Replace Exhibits SWP-6 through SWP-10 and Exhibit SWP-12 with Revised Exhibits SWP-6 through 10 and Revised Exhibit SWP-12. Revised Exhibit SWP-8 is PROPRIETARY.

**Exhibit 6: Carriers classified as wholesalers in analysis of FCC's triggers for  
dedicated transport - State of South Carolina**

ADELPHIA/TELCOVE  
DUKENET COMMUNICATIONS  
KMC TELECOM  
SCANA COMMUNICATIONS  
XSPEDIUS

**Exhibit 7: Interoffice routes in BellSouth territory where FCC's triggers for DS1 transport are met - State of South Carolina**

Index	Route			Triggers met	
	CLLI 1	CLLI 2	LATA	Self-provisioning	Wholesale
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC	N/A	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC	N/A	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC	N/A	YES
4	CLMASC SA	CLMASC SN	COLUMBIA, SC	N/A	YES
5	CLMASC SA	CLMASC SW	COLUMBIA, SC	N/A	YES
6	CLMASC SN	CLMASC SW	COLUMBIA, SC	N/A	YES
7	GNVLSCDT	GNVLSCWR	GREENVILLE, SC	N/A	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	N/A	YES
9	GNVLSCWR	SPBGSCMA	GREENVILLE, SC	N/A	YES

**Exhibit 8: Competitive carriers with transport facilities on routes between  
 BellSouth wire centers in the same LATA - State of South Carolina**

Route				Carrier and capacities			
Index	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC		YES	YES	YES
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC		YES	YES	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC		YES	YES	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC		YES	YES	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC		YES	YES	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC		YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC		YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC		YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC		YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC		YES	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC		YES	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC		YES	YES	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC		YES	YES	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC		YES	YES	YES
7	GNVLSCDT	GNVLSWWR	GREENVILLE, SC		YES	YES	YES
7	GNVLSCDT	GNVLSWWR	GREENVILLE, SC		YES	YES	YES
7	GNVLSCDT	GNVLSWWR	GREENVILLE, SC		YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC		YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC		YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC		YES	YES	YES
9	GNVLSWWR	SPBGSCMA	GREENVILLE, SC		YES	YES	YES
9	GNVLSWWR	SPBGSCMA	GREENVILLE, SC		YES	YES	YES
9	GNVLSWWR	SPBGSCMA	GREENVILLE, SC		YES	YES	YES

# **Exhibit 9: Interoffice routes in BellSouth territory where FCC's triggers for DS3 transport are met - State of South Carolina**

Index	Route			Triggers met	
	CLLI 1	CLLI 2	LATA	Self-provisioning	Wholesale
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC	NO	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC	NO	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC	NO	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC	NO	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC	NO	YES
7	GNVLSCDT	GNVLSCWR	GREENVILLE, SC	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	YES	YES
9	GNVLSCWR	SPBGSCMA	GREENVILLE, SC	YES	YES

**Exhibit 10: Interoffice routes in BellSouth territory where FCC's triggers for dark fiber transport are met - State of South Carolina**

Index	Route			Triggers met	
	CLLI 1	CLLI 2	LATA	Self-provisioning	Wholesale
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC	NO	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC	NO	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC	NO	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC	NO	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC	NO	YES
7	GNVLSCDT	GNVLSCWR	GREENVILLE, SC	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	YES	YES
9	GNVLSCWR	SPBGSCMA	GREENVILLE, SC	YES	YES



### Evidence of Willingness to Wholesale Transport

Carrier	Evidence	Source
Adelphia/Telcove	<p>"Local or intercity. TelCove can deliver the communications solution that is right for you.</p> <p>We are a facilities-based telecommunications provider with an 11-year history of delivering advanced, secure communications over our fiber optic network."</p>	<p>&lt;<a href="http://www.telcove.com/">http://www.telcove.com/</a>&gt;</p>
DukeNet Communications	<p>"Services we offer: Point to Point Local and Long Haul Connectivity ...ILEC Central Office Access"</p>	<p><u>DukeNet Company Overview.</u>  &lt;<a href="http://www.dc.duke-energy.com/content/PDF/brochure.pdf">http://www.dc.duke-energy.com/content/PDF/brochure.pdf</a>&gt;</p>
	<p>Five South Carolina cities are shown as being on the Network.</p>	<p>&lt;<a href="http://www.dc.duke-energy.com/content/Default.asp">http://www.dc.duke-energy.com/content/Default.asp</a>&gt;</p>
	<p>"DukeNet, a wholesale fiber-based carrier offering services in the Southeast, ...sells capacity primarily to long distance providers...The company offers point-to-point and long-haul connectivity at speeds including DS1, DS3, STS-1, Sts-3, OC3, OC12, OC48, and OC192, as well as ILEC central office access and collocation services."</p>	<p><u>U.S. CLEC Competitive Analysis, 2003.</u> June 2003, IDC.</p>

KMC Telecom	<p>"KMC Carrier Transport Service Applications: We bring all the pieces together for you. Our advanced multi-service broadband network platform is built for the future. We layer voice services directly through our #5ESS-2000 Lucent switch and over our local SONET Ring network for greater cost-efficiency, increased reliability, better performance and products that easily accommodate technology advances. KMC Carrier Transport Service product family includes a complete line of wholesale applications."</p>	<p>&lt;<a href="http://www.kmctelecom.com/advcomm/services/cl earpipe.cfm">http://www.kmctelecom.com/advcomm/services/cl earpipe.cfm</a>&gt;</p>
	<p>"Among other full-service features, KMC Telecom's collection of wholesale services includes a variety of offerings for the origination and termination of traffic in KMC Telecom cities. All services include access and transport of traffic over KMC Telecom's SONET Optical-Fiber Ring."</p>	<p>&lt;<a href="http://www.kmctelecom.com/advcomm/services/cl earthrough.cfm">http://www.kmctelecom.com/advcomm/services/cl earthrough.cfm</a>&gt;</p>
	<p>Augusta, Charleston, Colombia and Spartanburg are shown as "Advanced Communication Service Areas" on the Network Map</p>	<p>&lt;<a href="http://www.kmctelecom.com/maps.cfm">http://www.kmctelecom.com/maps.cfm</a>&gt;</p>
	<p>Augusta, Charleston, Colombia and Spartanburg are shown as "KMC Fiber Markets" on the Network Map. There are at least three additional Alabama cities shown as "Data Service Markets" on the map.</p>	<p>&lt;<a href="http://www.kmctelecom.com/advcomm/images/map_large.jpg">http://www.kmctelecom.com/advcomm/images/map_large.jpg</a>&gt;</p>
	<p>"KMC's transport facilities are designed and used only to carry traffic between a single BellSouth central office and the KMC node....traffic is carried to and from individual collocations and the KMC node; but not from collocation to collocation."</p>	<p>Rebuttal Testimony of Marva Brown Johnson, p. 14, lines 24-26 and p. 15, lines 14-15</p>

SCANA Communications	<p>"A carrier's carrier since 1985, ... SCANA's customers typically include carriers, service providers, enterprise clients, and governmental agencies. SCANA Communications services include fiber-based SONET and Ethernet transport capacity, premier data center and collocation facilities, and tower services."</p>	< <a href="http://www.scana.com/SCANA+Communications/About+Us.htm">http://www.scana.com/SCANA+Communications/About+Us.htm</a> >
	<p>High Capacity Long Haul Service: "SCANA has connectivity and a robust internal network that enable us to provide SONET-based digital bandwidth services to inter-exchange carriers, local exchange carriers, Internet Service Providers, wireless carriers and other wholesale clients." "Long Haul SONET-Based Capacity: DS1 (1.5 Mbps), DS3 (45 Mbps), OC-3 (155 Mbps), OC-12 (622 Mbps), OC-48 (2.488 Gbps) and Wavelength Services"</p>	< <a href="http://www.scana.com/SCANA+Communications/High+Capacity+Long+Haul+Services.htm">http://www.scana.com/SCANA+Communications/High+Capacity+Long+Haul+Services.htm</a> >
	<p>Special Access Service: "The ability to cost-effectively and reliably link nationwide networks to local networks is essential to a carrier's profitable growth. SCANA offers services to help shorten the last mile." "Last Mile Service for Carriers: SCANA Communications network of metropolitan fiber and co-location with local exchange carriers can provide the competitive edge your enterprise needs to grow your customer base. SCANA also constructs and manages customer networks for CLECs, IXC's and wireless service providers."</p>	< <a href="http://www.scana.com/SCANA+Communications/Special+Access+Services.htm">http://www.scana.com/SCANA+Communications/Special+Access+Services.htm</a> >

Xspedius	Carrier Solutions: "Xspedius Communications offers superior products and services to carrier customers in 36 markets the United States." Special Access: "Xspedius Communications Special Access is the perfect alternative for your local access networking needs. Our Special Access service provides optimal connectivity to major business districts, interexchange carrier points of presence (POPs), local serving offices (LSOs), carrier hotels and commercial end-user buildings."	< <a href="http://www.xspedius.com/carrier/index.shtml">www.xspedius.com/carrier/index.shtml</a> >
	"Special Access works off of our Metro SONET rings and can provide service between a customer location and a network service provider POP or between two service providers."	< <a href="http://www.xspedius.com/carrier/spacc.shtml">www.xspedius.com/carrier/spacc.shtml</a> >
	"Xspedius Fiber Group is a wholly owned subsidiary of Xspedius Communications. ...Each metropolitan area network is strategically designed for optimal connectivity of major Business Districts, Local Serving Offices, Carrier Hotels, and Interexchange Carrier Points-of-Presence (POP) sites. "	< <a href="http://www.xspedius.com/about/affiliates.shtml">http://www.xspedius.com/about/affiliates.shtml</a> >
	Columbia, Greenville and Spartanburg are shown on the Network Map as being cities in which Xspedius has a "metrofiber network"	< <a href="http://www.xspedius.com/images/int_network_map.pdf">http://www.xspedius.com/images/int_network_map.pdf</a> >

**Exhibit 8: Competitive carriers with transport facilities on routes between  
BellSouth wire centers in the same LATA - State of South Carolina**

Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC	KMC TELECOM	YES	YES	YES
1	CHTNSCDT	CHTNSCNO	CHARLESTON, SC	SCANA COMMUNICATIONS	YES	YES	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC	KMC TELECOM	YES	YES	YES
2	CHTNSCDT	CHTNSCWA	CHARLESTON, SC	SCANA COMMUNICATIONS	YES	YES	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC	KMC TELECOM	YES	YES	YES
3	CHTNSCNO	CHTNSCWA	CHARLESTON, SC	SCANA COMMUNICATIONS	YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	ADELPHIA/TELCOVE	YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	KMC TELECOM	YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	SCANA COMMUNICATIONS	YES	YES	YES
4	CLMASCSA	CLMASCSN	COLUMBIA, SC	XSPEDIUS	YES	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC	ADELPHIA/TELCOVE	YES	YES	YES
5	CLMASCSA	CLMASCSW	COLUMBIA, SC	KMC TELECOM	YES	YES	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC	ADELPHIA/TELCOVE	YES	YES	YES
6	CLMASCSN	CLMASCSW	COLUMBIA, SC	KMC TELECOM	YES	YES	YES
7	GNVLSCDT	GNVLSWR	GREENVILLE, SC	ADELPHIA/TELCOVE	YES	YES	YES
7	GNVLSCDT	GNVLSWR	GREENVILLE, SC	DUKENET COMMUNICATIONS	YES	YES	YES
7	GNVLSCDT	GNVLSWR	GREENVILLE, SC	XSPEDIUS	YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	ADELPHIA/TELCOVE	YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	DUKENET COMMUNICATIONS	YES	YES	YES
8	GNVLSCDT	SPBGSCMA	GREENVILLE, SC	XSPEDIUS	YES	YES	YES
9	GNVLSWR	SPBGSCMA	GREENVILLE, SC	ADELPHIA/TELCOVE	YES	YES	YES
9	GNVLSWR	SPBGSCMA	GREENVILLE, SC	DUKENET COMMUNICATIONS	YES	YES	YES
9	GNVLSWR	SPBGSCMA	GREENVILLE, SC	XSPEDIUS	YES	YES	YES

**BELLSOUTH TELECOMMUNICATIONS, INC.**

**WITNESS – SHELLEY W. PADGETT**

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

**APRIL 12, 2004**

**REBUTTAL TESTIMONY ERRATA**

1. p. 6, line 17. Delete “s” from DS3S so that the line reads “ECONOMICALLY PROVIDE DS3 SERVICES. DO YOU AGREE?”
2. p. 6, line 20. Insert a comma so that the line reads, “capable of providing, DS3 services to a building or along a route. The FCC”.
3. p. 8, line 1. Add an “s” to “building” so that the line reads, “Mr. Ball claims in his testimony that in multi-tenant buildings, the customer”.

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

)  
)  
)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s ("BellSouth") Submission of Errata and Witness Verifications in Docket No. 2003-326-C and 2003-327-C to be served on the following this April 12, 2004:

F. David Butler, Esquire  
General Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(Electronic Mail and US Mail)**

Rowland L. Curry  
Principal  
Curry and Associates  
1509 Mearns Meadow Blvd.  
Austin, Texas 78758  
**(Electronic Mail and US Mail)**

Robert Loube  
Director  
Economic Research  
Rhoads and Sinon, LLC  
10601 Cavalier Drive  
Silver Spring, MD 20901  
**(Electronic Mail and US Mail)**

Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(Electronic Mail and US Mail)**

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, South Carolina 29201  
(AT&T Communications of the Southern States, LLC)  
(NuVox Communications, Inc.)  
(Xspedius)  
(NewSouth Communications, Corp.)  
**(Electronic Mail and US Mail)**

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte  
1310 Gadsden Street  
Columbia, South Carolina 29211  
(Competitive Carriers of the South, Inc.)  
(ITC^DeltaCom Communications, Inc.)  
**(Electronic Mail and US Mail)**

Nanette S. Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
**(Electronic Mail and US Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Communications, Inc.)  
(Intermedia Communications, Inc.)  
(MCImetro Access Transmission Services, LLC)  
**(Electronic Mail and US Mail)**

Kennard B. Woods, Esquire  
MCI  
Law and Public Policy  
6 Concourse Parkway, Suite 600  
Atlanta, Georgia 30328  
**(Electronic Mail and US Mail)**



M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(SCTC)  
**(Electronic Mail and US Mail)**

Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(Electronic Mail and US Mail)**

H. Edwards Phillips, III, Esquire  
Legal Department Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(Electronic Mail and US Mail)**

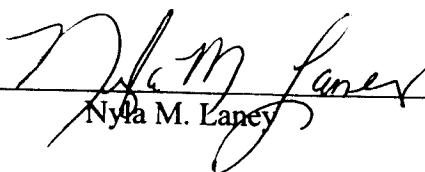
Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street  
Suite 1050  
Columbia, South Carolina 29201  
**(Electronic Mail and US Mail)**

Mr. Rohan Ranaraja  
Manager-State Governmental Affairs  
Alltel Telecommunications, Inc.  
1 Allied Drive  
Little Rock, Arkansas 72202  
**(Electronic Mail and US Mail)**

Allen G. Buckalew  
J. W. Wilson & Associates  
1601 North Kent Street  
Suite 1104  
Arlington, VA 22209  
**(Electronic Mail and US Mail)**

Ms. Melanie M. Lloyd  
7501 Callbraam Lane  
Austin, TX 78736  
(PSC Consultant)  
**(Electronic Mail and US Mail)**

Ms. Lisa Sapper  
Docket Manager - AT&T  
1121 Chapel Hill Road  
Madison, WI 53711  
**(Electronic Mail and US Mail)**

  
Nyla M. Laney

PC Docs # 512354